

Central Office Code Administration Functional Requirements

SECTION 5.2

Requirement 3: Assist in call completion problems.

Mitretek, in their capacity as Code Administrator, will assist in the resolution of call completion problems in accordance with the CO Code (NXX) Assignment Guidelines. Mitretek is aware that call completion problems occur from time to time, when new NXX codes are being established in the PSTN. We will assist in locating the source of the trouble by maintaining an up to date inventory of all NXX codes assigned, including effective date and associated code holder contact information. These tools will be used to assist in isolating and resolving call completion troubles. Mitretek's concern for maintaining the ubiquity of the telecommunications network only underscores the reasons why a regional office approach to central office code administration is essential. Mitretek will establish contacts within each local carrier in the region for the specific purpose of assisting with trouble shooting misrouted calls or calls that cannot be completed to NXXs assigned to carriers. Mitretek will have on-line access to RDBS/BRIDS as well as its own automated systems with the most up-to-date information which can be used to assist in troubleshooting.

C) References

1. Central Office Code (NXX) Assignment Guidelines (INC 95-0407-008)
2. Industry Notification of NPA Relief Activity Guidelines (ICCF 92-1127-006), Revised ICCF29, July 1993

Central Office Code Administration Functional Requirements

SECTION 5.2

3. Recommended Notification Procedures To Industry For Changes In Access Network Architecture (ICCF 92-0726-004, Revision 1, March 17, 1994)
4. Bellcore TRA Job Aid

D) Products/Output

The Administrators will complete and return Part 3 of the forms to the code applicant and if AOCN, will input Part 2 of forms to RDBS and BRIDS.

E) Organization/Staffing

Mitretek Central Office Code Administrators will be responsible for providing Industry Notification within their respective NPAs and will be fully trained to perform the functions as identified in the guidelines.

F) Systems/Interface

The Mitretek Administrator desktop systems will have the capability to enter data into the RDBS and BRIDS systems according to their respective specifications. This activity will be conducted in the most cost effective method possible. ■

5.2.4 NPA Relief Planning

Mitretek will fully comply with all requirements in Section 5.2.4.

Central Office Code Administration Functional Requirements

SECTION 5.2

Mitretek will assume the NPA Relief Coordinator functions specified in the NPA Code Relief Planning Guidelines (INC 94-1216-004, Rev. 1) and the Central Office Code (NXX) Assignment Guidelines (INC 95-0407-008). Mitretek acknowledges that regulatory authorities may choose to assume any of these responsibilities. In Federal Communications Commission CC Docket 96-98 regarding Interconnection the FCC restated its intention to retain authority to set policy with respect to all facets of numbering administration in the United States. The federal numbering guidelines were designed to ensure the fair and timely availability of numbering resources to all telecommunications carriers. However, in that same Order, the FCC authorized the states to resolve matters involving implementation of area codes. The FCC acknowledged that state commissions are uniquely positioned to understand local conditions and the effect that new area codes will have on those conditions. The FCC went on to say that each state's implementation method is subject to their Guidelines (originally established in the Ameritech Order) for numbering administration as enumerated below:

1. Facilitate entry into the communications marketplace by making numbering resources available on an efficient and timely basis
2. Not unduly favor or disadvantage any particular industry segment or group of consumers
3. Not unduly favor one technology over another

Central Office Code Administration Functional Requirements

SECTION 5.2

CC Docket 96-98 established further rules regarding specific NPA relief mechanisms. The FCC concluded that geographic area code splits and boundary realignments are presumptively consistent with the Commission's numbering administration guidelines, they clarified their previous guidelines with respect to how area code overlays can be lawfully implemented. These are listed below:

- A. All service-specific or technology-specific area code overlays are specifically prohibited because they would exclude certain carriers or services from the existing area code and segregate them in a new area code.
- B. State Commissions are subject to two conditions if they choose to implement an all-services overlay: (1) mandatory 10-digit local dialing by all customers between and within area codes in the area covered by the new code; and (2) availability to every existing telecommunications carrier, including CMRS providers, authorized to provide telephone exchange service, exchange access, or paging service in the affected area code 90 days before the introduction of a new overlay area code, of at least one NXX in the existing area code, to be assigned during the 90-day period preceding the introduction of the overlay.

Mitretek believes there are several fundamental criteria that must not be overlooked in the NPA relief planning process. They are summarized below:

- Impact to existing customers in the exhausting NPA must be minimized

Central Office Code Administration Functional Requirements

SECTION 5.2

- Impact to the telecommunications industry must be balanced
- Impact on all existing and potential code holders must be equitable
- Life of the old and new NPAs must be optimized
- Projected exhaust date and notification requirements must be met

A) Function

Mitretek will assume the role of NPA Relief Coordinator as described in the INC NPA Relief Planning Guidelines, which were developed to facilitate and help standardize the geographic NPA relief planning process. Responses to the specific requirements, identified in the NANC Requirements Document, associated with the role of NPA Relief Coordinator are addressed in Section B below, and depicted in Figure 5-3. Mitretek supports the organizational considerations noted in Section 6.1 of the Guidelines which describe the benefits of organizational continuity supported by thorough documentation and dissemination of information throughout the planning process and is committed to providing such continuity. Mitretek's five proposed MCACs strengthen our ability to understand and analyze unique characteristics with regard to demographics, geography, regulatory climate, technological considerations, and community needs—requirements which are so vital to the relief planning process.

Central Office Code Administration Functional Requirements

SECTION 5.2

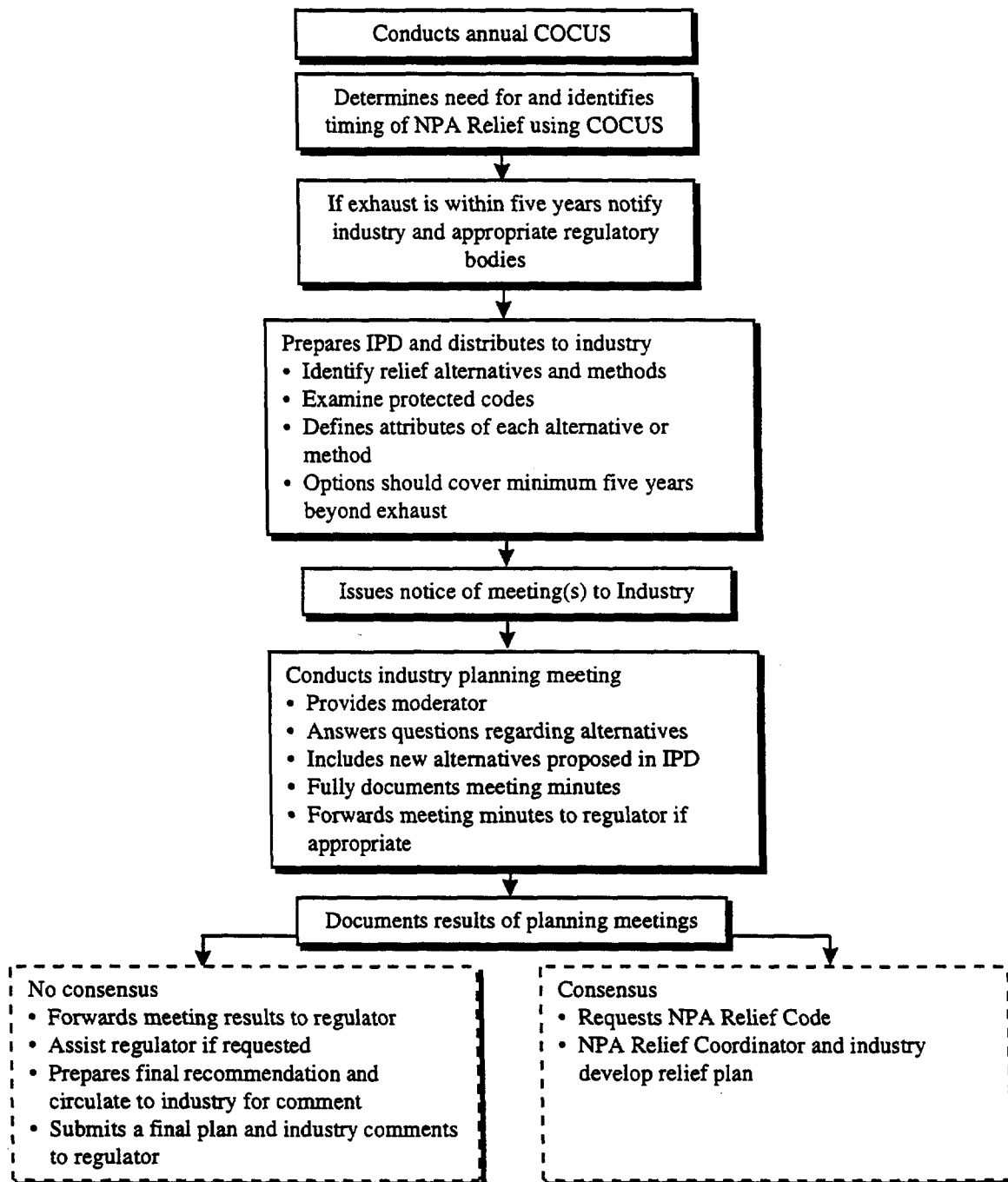


Figure 5-3. NPA Relief Planning Processes

Central Office Code Administration Functional Requirements

SECTION 5.2

B) Implementation

Requirement 1: Identifies need and timing.

Mitretek will determine the need for and identify timing of NPA Relief in accordance with the CO Code (NXX) Assignment Guidelines and NPA Code Relief Planning Guidelines. Mitretek is aware that COCUS (Central Office Code Utilization Survey) is the primary tool used to perform this function. It is recognized that the overall code administration process (e.g., planning for number relief) is related to and will require exchange of information with the CO code (NXX) assignment process. Mitretek Code Administrators will track NXX assignments within NPAs to ensure efficient and effective utilization of numbering resources. Annual COCUS studies will be conducted utilizing projected demand forecasts, provided by code holders, to identify NPAs nearing exhaust. This data, combined with the tracking of day to day assignments, will strengthen the tools used by the Administrators who will undertake more frequent analysis of trends, comparisons of COCUS forecasts to actuals, and revise projected NPA exhaust dates throughout the year thereby improving the identification of need for NPA relief. Based on the Bellcore NANP Area Codes-1997 Update report, Mitretek has identified the planning requirement for each NPA forecasted to exhaust, by MCAC, as demonstrated in Figures 5-4 through 5-8. It is Mitretek's hope, that as the new NANP Administrator, because of our clear neutrality position with the Industry, that projected NXX demand data from code holders will be more accurate and timely. Mitretek recognizes that with the current competitive environment, the collection of COCUS data has been a difficult task and the impact on

Central Office Code Administration Functional Requirements

SECTION 5.2

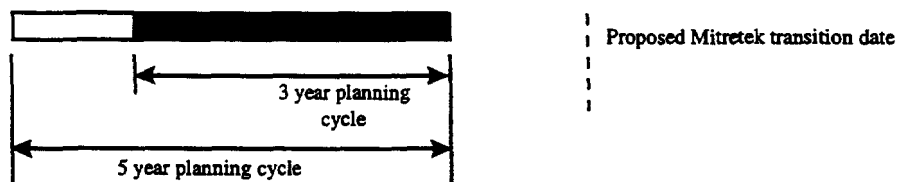
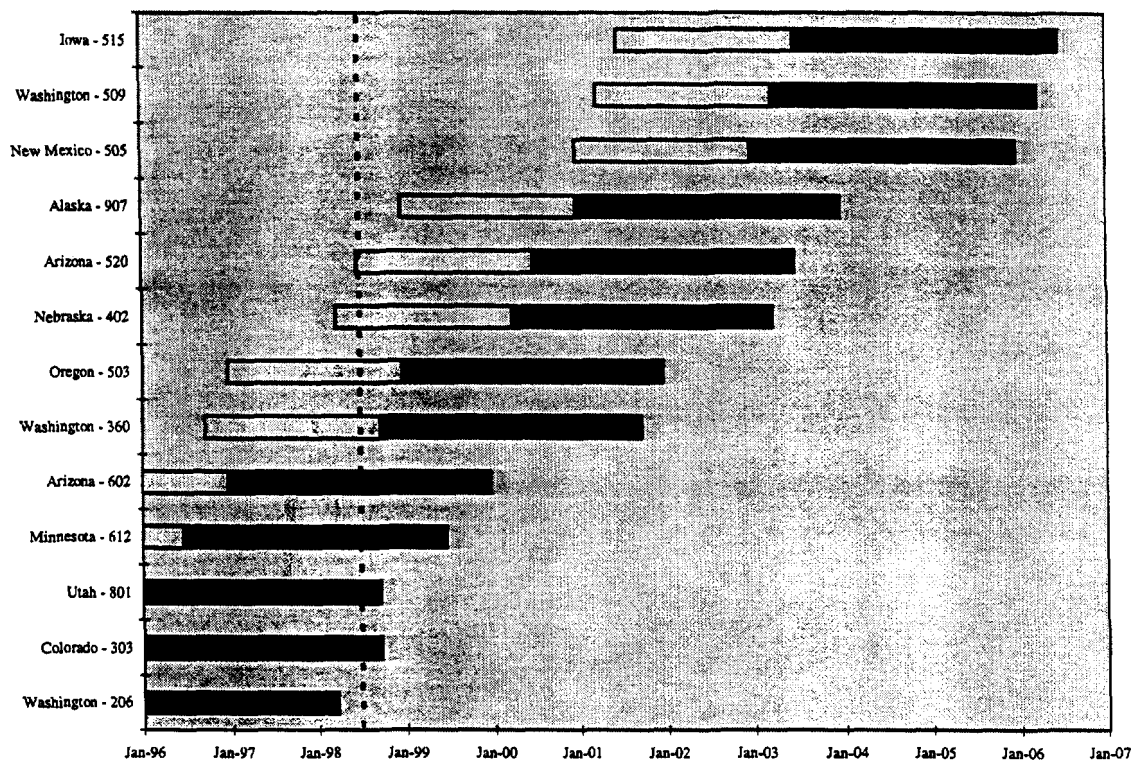


Figure 5-4. Mountain NPA Relief Planning Requirements Forecasted by Exhaust Date

Central Office Code Administration Functional Requirements

SECTION 5.2

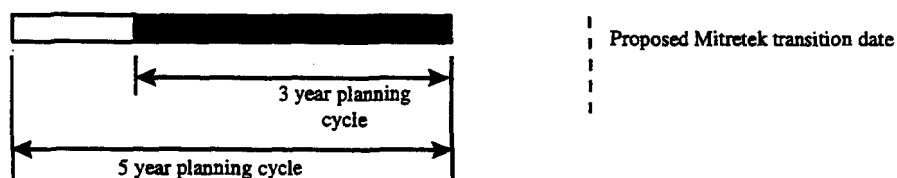
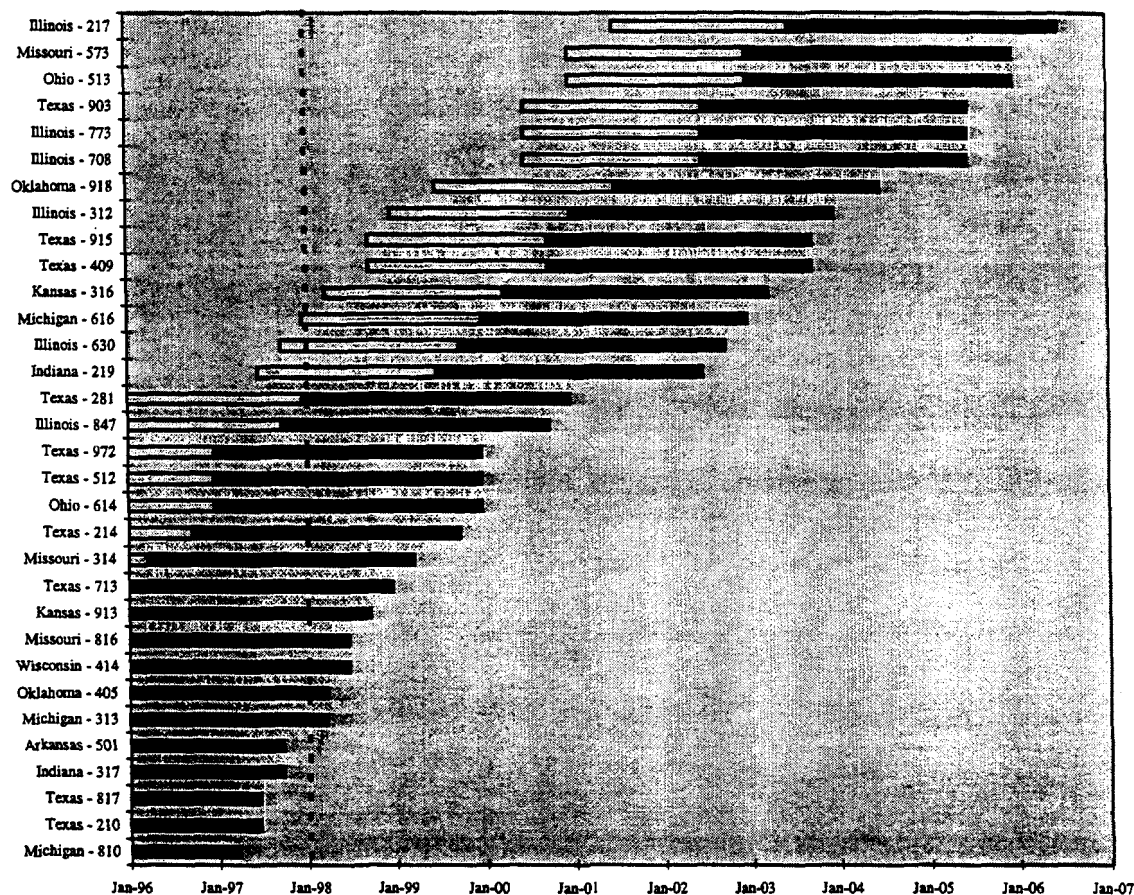


Figure 5-5. Midwest NPA Relief Planning Requirements Forecasted by Exhaust Date

Central Office Code Administration Functional Requirements

SECTION 5.2

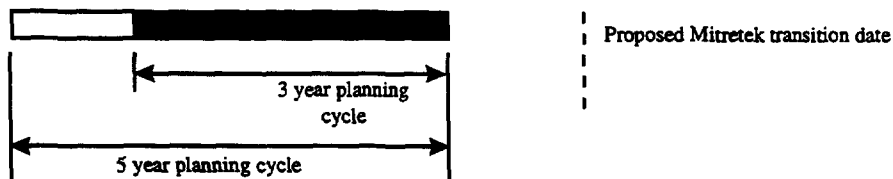
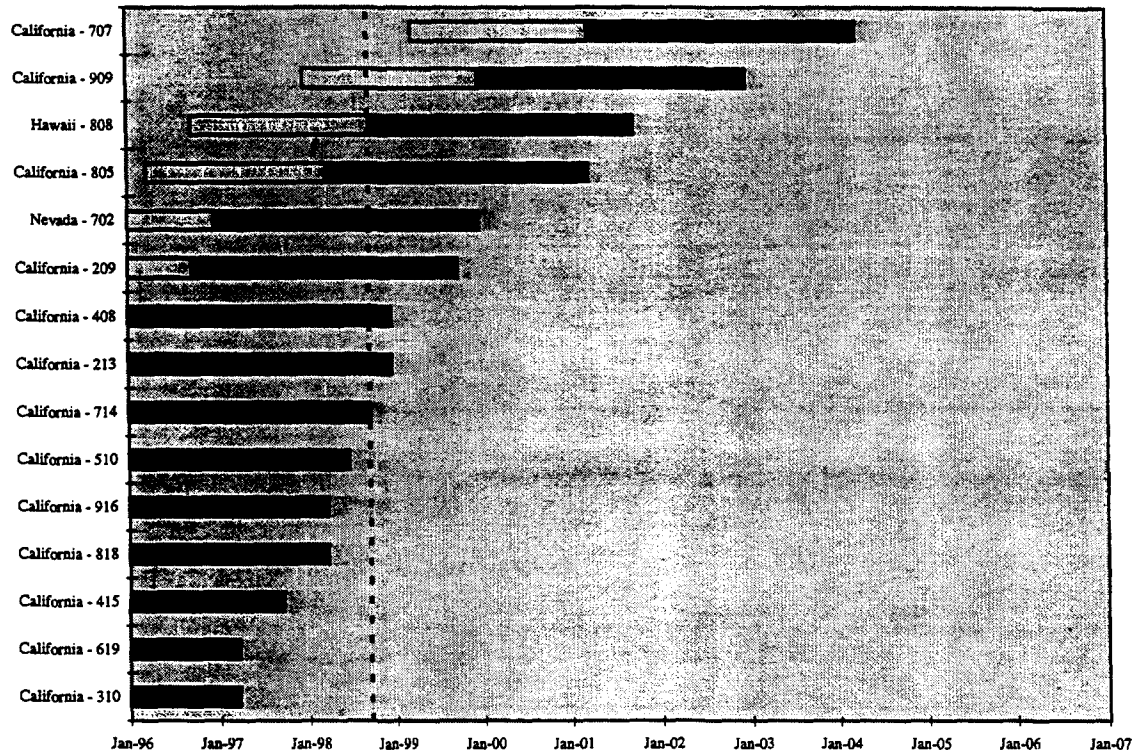


Figure 5-6. Western NPA Relief Planning Requirements Forecasted by Exhaust Date

Central Office Code Administration Functional Requirements

SECTION 5.2

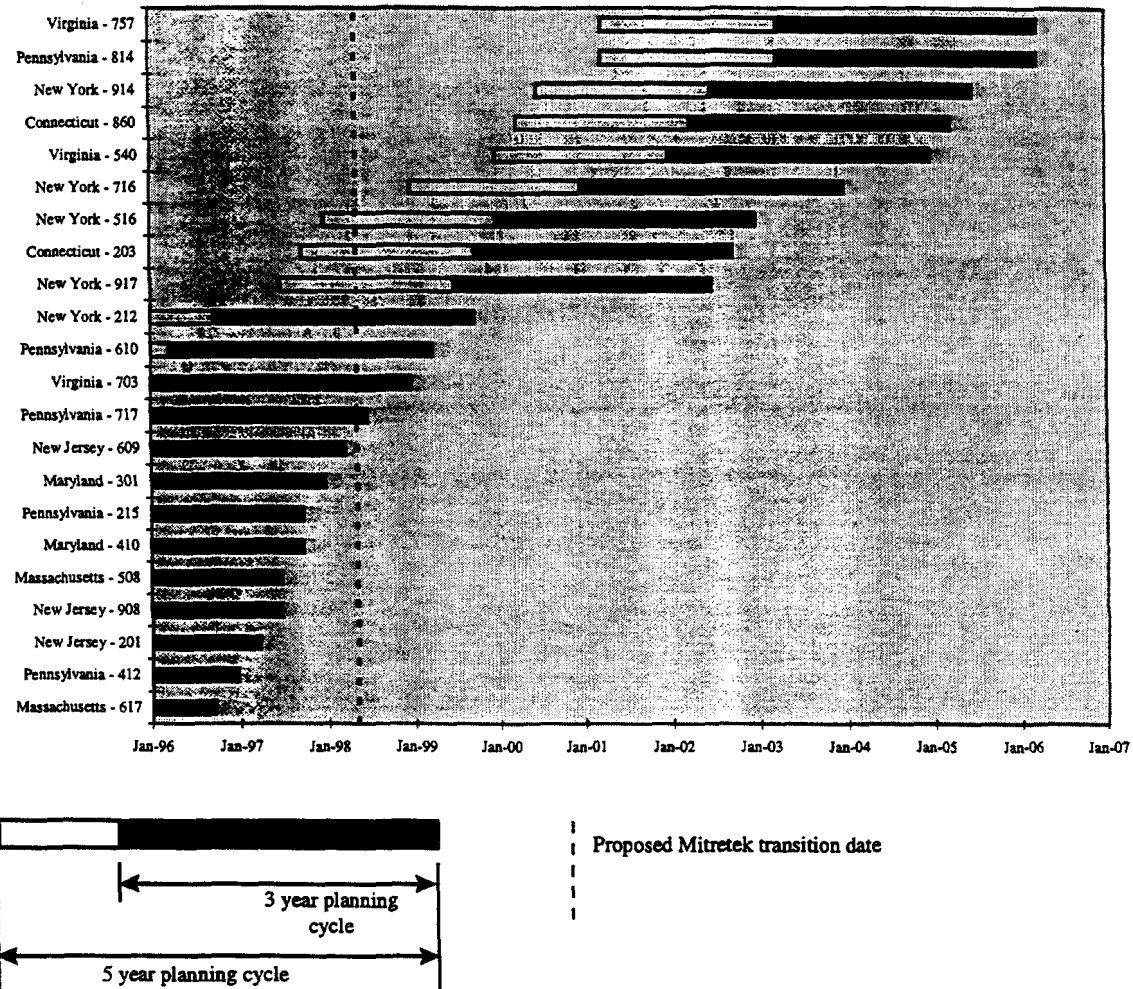


Figure 5-7. Eastern NPA Relief Planning Requirements Forecasted by Exhaust Date

Central Office Code Administration Functional Requirements

SECTION 5.2

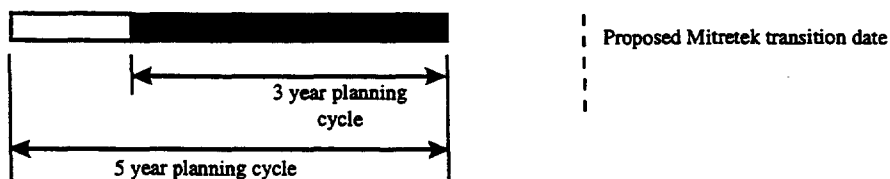
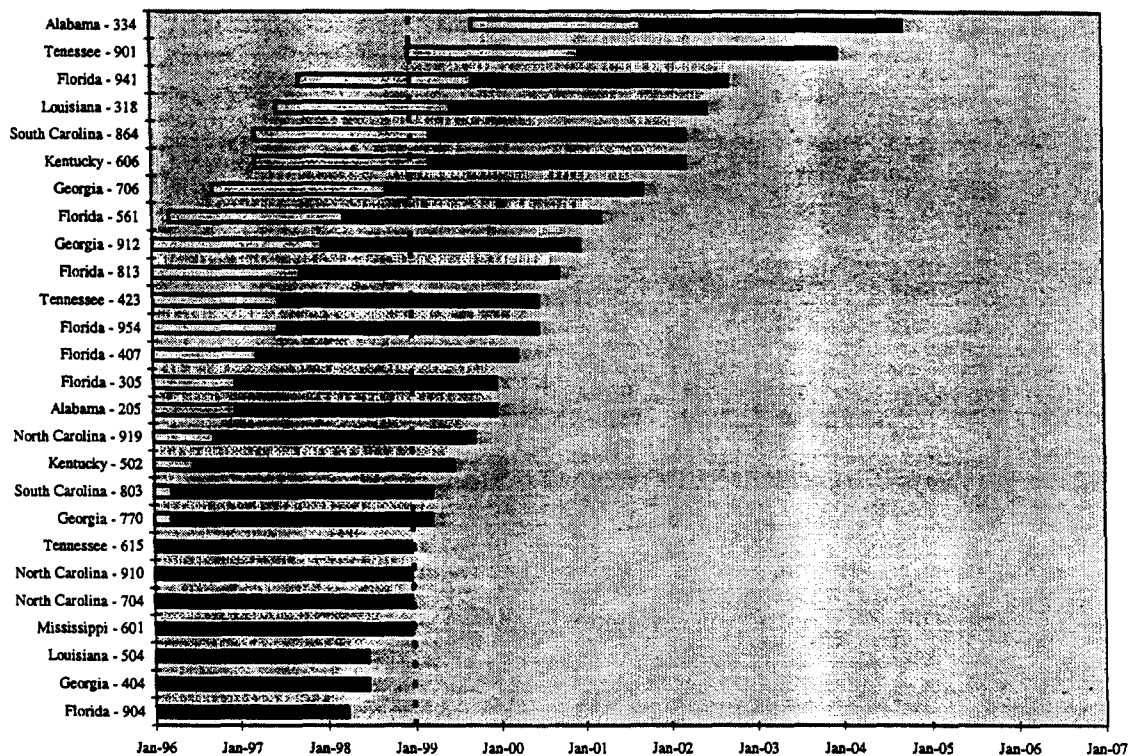


Figure 5-8. Southern NPA Relief Planning Requirements Forecasted by Exhaust Date

Central Office Code Administration Functional Requirements

SECTION 5.2

Requirement 2: Communicates with all affected industry members and appropriate regulatory bodies.

NPA relief planning could be significant. On average, NPA relief planning has occurred within three to four years of exhaust rather than five. As inputs to COCUS improve with a neutral third party in place, the recent trend of shortened planning cycles may continue however we will strive to reestablish the five year window. Ideally, relief planning should commence no less than five years before an NPA is projected to exhaust as stipulated in the Guidelines. In the recent past, due to sudden and volatile growth in both services and service providers, coupled with the competitive weaknesses encountered in collecting COCUS data, this five year planning window has often been shortened to less than three years from NPA exhaust. (Note: Figures 5-4 through 5-8 reflect both three and five year planning timelines.) It is Mitretek's goal to reestablish a minimum planning window of no less than five years. Mitretek NANP Administration will promptly communicate with all affected industry members and appropriate regulatory bodies to inform them of the situation in that NPA.

When announcing the pending exhaust of an NPA, the NPA Relief Coordinator will issue the Initial Planning Document (IPD) and meeting schedules to industry members defined in Section 4.4 of the Guidelines. The industry shall be given sufficient time prior to an initial NPA Relief Planning meeting to fully analyze the alternatives contained in the IPD. Notice of pending exhaust will be accomplished using all the communications tools

Central Office Code Administration Functional Requirements

SECTION 5.2

available, including but not limited to, the Mitretek Web site and electronic distribution programs.

Requirement 3: Prepares Initial Planning Document.

Mitretek, as the NPA Relief Coordinator, will take the lead in preparing IPDs, which would present various relief alternatives and methods from among those identified in Section 5 of the NPA Relief Planning Guidelines, for each NPA projected to exhaust over the forecast period. Each relief method will list and quantify the impacts, using Appendix A of the NPA Relief Planning Guidelines. Each alternative will cover a period of at least five years beyond the predicted date of exhaust, and will cover more than one relief activity if necessary, during this extended timeframe. Mitretek notes a key recommendation in the guidelines is that customers who undergo number changes shall not be required to change again for a period of 8-10 years. Specific calculations such as the relative lengths of the relief periods, impacts of dialing local calls using 7 digit or 10 digits and the quantity of subscribers requiring number changes will also be included in the IPD. The IPD which may be viewed on the Mitretek Web site, will be a living document, reflecting changes that may take place over time. The IPD will also contain information on future industry meetings, including date, location, and contact information. Mitretek will encourage industry and local regulatory involvement throughout the planning process.

Central Office Code Administration Functional Requirements

SECTION 5.2

Requirement 4: Conducts NPA Relief Meetings, obtain endorsement of regulatory authorities on relief plan and date.

Mitretek will conduct all NPA Relief Planning meetings with the goal of achieving industry consensus on a relief plan. Once consensus has been achieved on the timing and method of relief for an NPA, the Mitretek Relief Coordinator will seek out the endorsement of regulatory authorities as set out in the NPA Relief Planning Guidelines.

Requirement 5: Plans, notifies, and moderates relief planning meetings.

The Mitretek NPA Relief Coordinator shall notify interested industry and regulatory parties when an initial or subsequent meeting is to be held, announcing the date, time, location, and contact information, encouraging full participation. Notification of meetings will be provided via Mitretek's Web site, e-mail, fax, mail, and/or any other means required to ensure all appropriate parties are well informed. Mitretek Administration Centers will provide the leadership and moderator function for all relief planning meetings and/or conference calls. The meetings will be run in a fair and impartial manner ensuring that all participants have an opportunity to express their opinions. Mitretek personnel will be responsible for issuing meeting announcements, coordinating meeting arrangements, leading the meetings, documenting and issuing meeting notes, and other relevant tasks. Mitretek's proposal of several code Administration Centers underscores our belief in the importance of "local presence" and possessing knowledge of the local environment.

Central Office Code Administration Functional Requirements**SECTION 5.2****Requirement 6: Identifies possible relief options and methods.**

Mitretek will identify the possible NPA relief options and methods, keeping in mind that each relief option may include more than one “relief method” such as split, overlay, or boundary realignment as noted in the guidelines.

Requirement 7: Qualifies impacts, advantages, and disadvantages of alternatives.

In addition to the IPD, Mitretek, as the NPA Relief Coordinator, will lead the industry in a discussion of basic assumptions/criteria for NPA relief planning. Included in that discussion will be determination of general attributes of the NPA relief methods—split, overlay, or boundary realignment. Advantages and disadvantages of each method identified, and the various options available with each method, will be documented. Mitretek’s advanced forecasting techniques and models can be used to assist in performing “what if” analysis quickly at these meetings. Mitretek has expertise in this area, having led similar multidisciplinary meetings with U.S. government agencies.

Requirement 8: Submits results of industry consensus or non-consensus to regulatory body, get assistance as needed.

Mitretek will submit to the appropriate regulatory body the results of the industry effort regarding NPA relief planning when consensus is reached or alternatively, when consensus cannot be reached in the timeframe established for reaching industry consensus. If the latter occurs, the NPA Relief Coordinator will ask the Regulatory body for assistance in

Central Office Code Administration Functional Requirements

SECTION 5.2

reaching a solution. The Regulatory body will be provided with any background information necessary, including comments of industry participants. Mitretek recognizes that regulatory requirements may dictate additional events/timelines in particular states (e.g., California Public Utilities Code requires the NPA Relief Coordinator to conduct at least three public meetings in the affected geographical area) to give affected subscribers an opportunity to be heard on the potential impact of the proposal.

Requirement 9: Provide testimony.

Should regulatory activity in a region undergoing NPA relief planning require testimony, Mitretek will provide testimony as necessary. Testimony in sometimes adversarial proceedings will be a delicate balance for Mitretek NANP Administration. Mitretek NANP Administration will participate in the proceeding as an unbiased expert.

Requirement 10: Assigns new NPA per relief plan.

Mitretek NANP Administration, will assign the new NPA code(s) prior to the NPA relief date in accordance with the approved relief plan. Again, Mitretek recognizes that timing of this activity could vary across regions/states, however barring any local regulatory constraints, this activity will occur at least 18 months prior to the relief date. As many changes may be required to equipment, networks, hardware and software, early notice must be given to support a smooth and orderly implementation.

Central Office Code Administration Functional Requirements

SECTION 5.2

Requirement 11: Provides industry notification on relief plan activities.

Mitretek will provide industry notification of NPA relief activities per the Industry Notification of NPA Relief Activity Guidelines (ICCF 92-1127-006). A minimum of 12 months of advance notice of an NPA split/overlay/boundary realignment will be provided. The notice will include a full disclosure of the associated testing period, permissive dialing period, ANI and records conversion dates, and the beginning date for mandatory dialing of the new NPA. Also included in this information will be a test number for routing verification and the date it will become available. New boundary maps, new dialing procedures (if any), and a local contact name and telephone number will be provided. This information will be posted on the Mitretek NANP Administration Web site.

Requirement 12: Prepares press releases.

As the NPA Relief Coordinator, Mitretek will, with input and direction from the industry relief planning team, prepare and issue a press release to inform the public of the approved Relief Plan. Mitretek will respond to requests from the media and public for information, as necessary. Mitretek is aware that certain states may require input from the public to the planning process (e.g., California) and will be sensitive to the type of information released in public statements.

Central Office Code Administration Functional Requirements

SECTION 5.2

Requirement 13: Assists NASC in modification of 800/888 toll free database.

Mitretek will assist NPA Relief implementation teams as necessary, either from the headquarters perspective or on a local basis. Mitretek will assist the Number Administration Service Center (NASC) in modifications to the 800/888 database as required.

C) References

- Central Office Code (NXX) Assignment Guidelines (INC 95-0407-008)
- NPA Code Relief Planning Guidelines (INC 94-1216-004)
- Industry Notification of NPA Relief Activity Guidelines (ICCF 92-1127-006), Revised ICCF29, July 1993
- NPA Allocation Plan and Assignment Guidelines (INC 96-0308--011) Revision, April 19, 1996
- Recommended Notification Procedures To Industry For Changes In Access Network Architecture (ICCF 92-0726-004, Revision 1, 17 March 1994)

Appropriate State Statutes/State Regulatory Codes where applicable.

D) Products/Output

Mitretek, as the NPA Relief Coordinator, will provide the following products related to the NPA Relief Planning process: Notice of Pending NPA exhaust, Initial Planning

Central Office Code Administration Functional Requirements

SECTION 5.2

Document, Relief Plan, Relief Planning meeting moderator, meeting documentation, testimony (as required), industry notification including press releases.

E) Organization/Staffing

Mitretek will fully comply with all of the requirements in Section 5.2.4 of the NANC NANP Administration Requirements Document. Each Mitretek CO Code Administrator and NPA Relief Coordinator will possess strong project management skills in order to perform the planning functions associated with these roles (i.e., COCUS, IPD). The Administrators will possess the interpersonal, communication, and negotiation skills required to effectively facilitate NPA relief planning meetings and interfaces with clients. CO Code Administrators/NPA Relief Coordinators will have certain public relations skills necessary to explain complex numbering issues to the media and the public consistent with local positions on numbering and dialing issues.

F) Systems/Interface

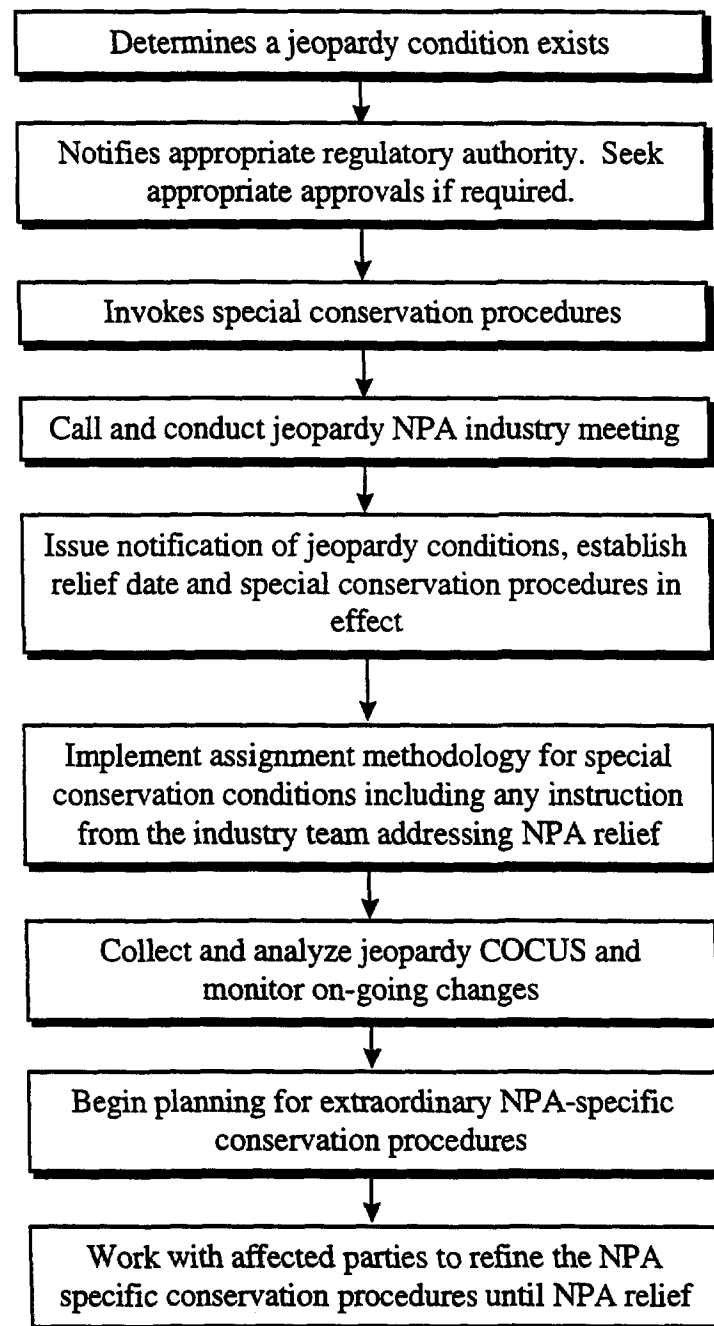
For a description of electronic interfaces with NPA relief planning data, see Section 9.2.2.4. ■

5.2.5 Jeopardy NPA Processes

Mitretek will fully comply with the requirements in Section 5.2.5 as depicted in Figure 5-9 and discussed in response to the requirements.

Central Office Code Administration Functional Requirements

SECTION 5.2

**Figure 5-9. Jeopardy NPA Processes**

Central Office Code Administration Functional Requirements**SECTION 5.2**

Responsibility for code conservation rests not only with Mitretek NANP Administration, but also with the code applicants/code holders. NANP resources must be assigned to permit the most efficient and effective use of this finite numbering resource to delay NPA exhaust and the need for NPA relief for as long as possible, with the ultimate goal to delay the eventual exhaust of the NANP. However, the recent explosion in telecommunications technology (e.g., wireless, faxes, modems, Internet activity) and the implementation of local competition have accelerated the exhaust of many geographic NPAs. This demand for numbers will likely continue in the near future, as such issues as Local Number Portability pooling and rate center consolidation have not yet been resolved by the industry. Because of this somewhat unexpected drain on resources, combined with normal code activity, many NPAs are facing a numbering crisis and a jeopardy situation, with the potential of exhausting the existing NPA before the relief NPA can be implemented.

A) Function

Mitretek NANP Administration will assume the jeopardy NPA process responsibilities, including, but not limited to, those described in the Guidelines.

Central Office Code Administration Functional Requirements

SECTION 5.2

B) Implementation

Requirement 1: Determine when to declare a jeopardy condition.

Mitretek will take full advantage of our analytical algorithm and forecasting tools to monitor the assignment levels of all NPAs. Automated systems will be used to flag those NPAs which may be approaching a jeopardy situation, allowing Mitretek to quickly identify when a jeopardy condition may exist. By continually monitoring CO code growth and forecasts, Mitretek Code Administrators will regularly review NPA status and, thus determine if and when to declare a jeopardy NPA condition. A jeopardy NPA condition exists when the forecasted and/or actual demand for NXX resources will exceed the known supply during the planning/implementation interval for relief.

Requirement 2: Notifies appropriate regulatory authorities and affected parties.

When Mitretek determines, based on the NPA Relief Planning Guidelines (INC 94-1216-004), that an NPA is in jeopardy, the Code Administrator will notify the appropriate regulatory authority that the NPA is in jeopardy and that special conservation procedures need to be invoked. In addition to notifying regulators, affected parties (e.g., code holders) will be notified of the jeopardy situation. The Code Administrator will seek the approval of the regulatory authorities, if appropriate, prior to implementing special conservation provisions.

Central Office Code Administration Functional Requirements

SECTION 5.2

Requirement 3: Invokes special conservation procedures.

Special conservation procedures will be implemented immediately upon determining an NPA jeopardy condition exists, and following regulatory approval if appropriate.

Requirement 4: Calls and conducts jeopardy NPA Industry meetings.

Once an jeopardy NPA situation has been identified, and appropriate regulatory notice/approval received, the Mitretek Code Administrator will notify affected parties of the established code relief date and the special conservation procedures which will be invoked (as described in Section 8.4 of the CO Code (NXX) Assignment Guidelines). Following this notification, the Administrator will convene a meeting of the affected parties and appropriate regulatory authorities, to provide an explanation of the jeopardy situation. Any special conservation procedures required during this jeopardy condition will be identified and discussed. During the jeopardy period, planning for extraordinary NPA-specific conservation procedures will begin. All such notices will be placed on the Mitretek Web site and supplemented by fax or mail as required. During this period, the Code Administrator will treat all code requests in a fair and impartial manner. Code holders have specific requirements during this special conservation period: (a) for additional codes for growth, code holders will be required to certify that existing codes for the switching entity/POI, per service provided by that switching entity or POI, will exhaust within six months and will have documented supporting data in the form of telephone numbers available for assignment, growth history for 6 months, projected demand for the

Central Office Code Administration Functional Requirements

SECTION 5.2

coming six months, (b) holders of reserved codes will be asked to voluntarily return their codes or confirm their planned reservation dates, (c) requests for assignment of new codes for other than growth or to serve a new switching entity/POI should be minimized, (d) increased code sharing should be considered. The Code Administrator will encourage compliance with these requirements, and apply code reclamation procedures if necessary.

Requirement 5: Collects and compiles jeopardy COCUS forms.

The Mitretek Code Administrator will enforce the jeopardy NPA process requirement that each code holder review their forecast and demand data and provide the information to the Code Administrator within 30 days using the "Jeopardy COCUS" form.

Requirement 6: Implements extraordinary NPA conservation measures per local industry or regulatory direction.

Unique circumstances within a given jeopardy NPA may require extraordinary NPA-specific conservation procedures. In this event, the Mitretek Code Administrator, in conjunction with the affected parties in the jeopardy NPA, will develop these extraordinary conservation procedures. These procedures will continue to be refined, as necessary, until NPA relief is implemented. The Code Administrator will notify the applicable regulatory authority of the NPA-specific procedures and, if appropriate, obtain approval for the procedures.